

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AECOM ENERGY & CONSTRUCTION,
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,
Defendant.

Case No. 20-2016 C

JOINT STATUS REPORT

Plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (URS) and Defendant the United States of America (Government) submit this Joint Status Report pursuant to the Court's Amended Discovery Scheduling Order. *See* ECF No. 23.

Since the December 29, 2022 Joint Status Report, the parties continued to meet and confer regarding deficiencies in the Government's collection and production efforts. During this process, which involved input from URS's forensic e-discovery consultants and the Government's e-discovery personnel, the parties confirmed deficiencies in the way the Government was collecting and processing documents that negatively and materially impacted the data it was producing to URS. The Government acknowledged these deficiencies, and to resolve these issues, agreed to recollect custodial email at the mailbox level and reproduce responsive emails with the assistance of an experienced e-discovery vendor. The Government expects the recollection of all email data from the agreed-upon Department of Energy custodians to be complete by April 14, 2023 and from the Naval Reactors custodians to be complete by May 15, 2023. The Government is continuing to identify and collect responsive documents from the Environmental Protection Agency and expects the collection of those materials to be complete

by May 31, 2023. URS has not agreed to the Government's expected dates for the completion of recollection of Naval Reactor custodial email and completion of initial collection of EPA materials—which were supposed to have been produced by September 30 of last year. The parties are continuing to confer regarding these proposed dates.

The Government has made one additional production of documents since September 30, 2022, but has halted further productions until it completes its email recollection to ensure that all future productions capture documents from all custodians, are complete, and contain necessary metadata. The parties are conferring regarding search parameters for the Government to use against the newly-collected emails, given the Government's change in collection methods. If and when an agreement concerning the search parameters and timing of collection and production is reached, the parties intend to jointly move for a modification of the Court's Amended Discovery Scheduling Order. If, for some reason the parties cannot come to an agreement, URS intends to move the Court to enter a deadline for the completion of the production of all Government documents.

March 29, 2023

Respectfully submitted,

/s/ Charles C. Speth

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